

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-CR-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

FILED BY
04 APR 23 PH 2:46
CLERK OF DISTRICT
COURT S.D. OF FL - MIAMI
D.C.

MOTION FOR PERMISSION TO TRAVEL WHILE ON PROBATION

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests that this Honorable Court enter an Order permitting the Defendant to leave the State of Florida, and travel to Foxwoods Resort & Casino, Foxwood, Connecticut, and for grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, has been serving a three (3) year probationary term since August 2003 without incident.
2. That the Defendant since being placed on probation has traveled on two (2) occasions with the permission of his United States Probation Officer to the State of New York to visit with family.
3. That the Defendant respectfully requests this Honorable Court grant him permission to travel to the State of Connecticut for the period of May 14, 15, and 16, 2004, for a short vacation.
6. That the Defendant desires to travel outside of the State of Florida for approximately Three (3) days beginning on or about May 14, 2004 and returning May 16, 2004.
7. That the Defendant will be traveling with his employer on a charter flight and staying at the Foxwoods Resort & Casino, Foxwood, Connecticut.
7. The Defendant consistent with his special conditions of probation will not participate in any gambling activities during his stay in Connecticut.
8. That undersigned counsel has discussed this matter with his United States

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Probation Officer, Anthony Gagliardi, who has expressed no objection to this travel request.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order permitting the Defendant to travel outside the State of Florida to the State of Connecticut.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Anthony Gagliardi, United States Probation, 6100 Hollywood Boulevard, Suite 501, Hollywood, FL 33024, by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 22 APRIL, 2004.

Respectfully submitted,

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By: 

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